

BAKER DECLARATION

EXHIBIT T

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)
Plaintiff,)
vs.) No. 3:17-cv-05806-RJB
THE GEO GROUP, INC.,) SOME OF THE EXHIBITS AND
Defendant.) THE TESTIMONY REGARDING
AS CONFIDENTIAL.

DEPOSITION UPON ORAL EXAMINATION
OF
BRUCE SCOTT

10:02 a.m.
May 20, 2019

800 Fifth Avenue 2000
Seattle, Washington 98164



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



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1 Air Force. And I have a bachelor's of science with
2 Southern Illinois, Carbondale, in workforce education
3 and training.

4 Q. What did you do for the U.S. Air Force?

5 A. I was a firefighter.

6 Q. How long did you do that?

7 A. For 20 years.

8 Q. So when you were hired at Geo in April of
9 2010, what was the job that you were hired for?

10 A. I was hired as the fire safety manager.

11 Q. What were your responsibilities?

12 A. Oversee all the standards, policies,
13 standards, and accreditations congruent with the fire
14 safety program.

15 Q. Anything else?

16 A. A lot of things. But that sums up the fire
17 safety program.

18 Q. So you were in charge of the fire safety
19 program?

20 A. Yes.

21 Q. What -- you said it involves "a lot of
22 things." What were some of those things?

23 A. Meeting all the applicable codes,
24 accreditations, policies, and standards when it comes to
25 fire safety: Any NFPA standards, all of the NFPA



1 the use of floor stripper." Do you see that?

2 A. I do see that.

3 Q. Who's responsible for making sure floor crews
4 are trained in the use of floor stripper?

5 MR. DONAHUE: Object to the form.

6 A. There is mention in the Voluntary Work Program
7 chapter part of the standard that talks about ensuring
8 detainees are trained in the use of -- when it comes to
9 the Voluntary Work Program, typically training happens
10 on the onset of the Voluntary Work Program. When it
11 comes to who -- and this was before my time -- I see
12 Mr. Hucke was the fire and safety manager at the time.
13 So . . .

14 Q (By Ms. Chien) Let's talk from when you were
15 the fire and safety manager. Who was responsible for
16 making sure floor crew were trained on the use of floor
17 stripper?

18 MR. DONAHUE: Object to the form.

19 A. Well, the way our program's laid out now, the
20 training happens at the onset of any task to make sure
21 that any floor stripper or any other cleaning chemical
22 that's allowed and authorized by the ICE standard and
23 ACA standards, that detainees receive information, SDS
24 or safety data sheets, on those and understand the use
25 and the PPE required by those documents. That should



1 happen before the onset of the task.

2 And whoever's supervising those detainees that
3 day, who also, based on Geo requirements under the fire
4 safety program, would also have received training and
5 knowledge on the chemicals and the use of the chemicals
6 in the workplace, would have oversight of those
7 detainees, making sure that they essentially follow the
8 same guidelines that Geo employees would follow, that
9 they're trained for.

10 Q (By Ms. Chien) What's PP&E?

11 A. PPE is personal protective equipment.

12 Q. So I think you were maybe testifying as to
13 what was happening now. I'm wondering if we go to when
14 you were the -- during your tenure as fire and safety
15 manager, who was responsible for making sure detainee
16 workers used PPE?

17 MR. DONAHUE: Object to the form.

18 A. The testimony that I gave is how it was when I
19 was onboard. There is -- this one's prior to my time.

20 Q (By Ms. Chien) Right. I understand. Okay.
21 So I'm done with this document. So you can set that
22 aside.

23 So during your time, you mentioned that
24 detainees who worked in the Voluntary Work Program
25 received training at onset of their tasks. Is that



1 MR. DONAHUE: Object to the form.

2 A. Will give them guidelines on how to do that
3 job, the sanitation job, in those areas.

4 Q (By Ms. Chien) Let's move to laundry. Who
5 gives the training to detainee workers in the Voluntary
6 Work Program who work in laundry?

7 MR. DONAHUE: Object to the form.

8 A. So the laundry officer who's knowledgeable of
9 that laundry process would then train those workers in
10 that area.

11 Q (By Ms. Chien) That laundry officer is a Geo
12 employee?

13 A. Yes.

14 Q. Do they have any -- what training does
15 laund -- what's the difference between a laundry officer
16 and a detention officer?

17 MR. DONAHUE: Object to the form.

18 A. There's no real difference besides the laundry
19 officer has additional training and understanding of the
20 laundry processes, the equipment, and the chemicals in
21 the laundry area.

22 Q (By Ms. Chien) Who trains detainee workers
23 that work in the food services department?

24 MR. DONAHUE: Object to the form.

25 A. The food service administrator would be



1 responsible for ensuring the training required by the
2 standard in done in the food service department.

3 Q (By Ms. Chien) And the food service
4 administrator is a Geo employee?

5 A. Yes.

6 Q. When you refer to sanitation and cleaning, you
7 were talking about moving trash, sweeping. Are you
8 familiar with detainee workers buffing floors as well?

9 MR. DONAHUE: Object to the form.

10 A. Yes.

11 Q (By Ms. Chien) Is that included within your
12 sanitation and cleaning when you were referring to
13 sanitation and cleaning?

14 MR. DONAHUE: Same objection.

15 A. That's one of the many jobs that are offered
16 for detainees to do.

17 Q (By Ms. Chien) Who trains detainee workers on
18 how to buff floors?

19 MR. DONAHUE: Object to the form.

20 A. Again, the Voluntary Work Program Agreement
21 will outline the base training requirements. And then,
22 whoever it is overseeing that job -- and I know in the
23 past we've also had actual contractors that supplied the
24 chemicals come in and train staff which we've also
25 allowed detainees to witness.



1 Q (By Ms. Chien) "Train staff," meaning Geo
2 employees?

3 A. Geo employees.

4 Q. Do you know the name of that contractor?

5 A. I can't recall off the top of my head.

6 There's the people we buy from. Then they buy from --
7 it's all contract stuff. I don't know who the specific
8 one is. I wouldn't want to guess.

9 Q. What about barbershop? Are detainee workers
10 working in the barbershop?

11 A. The barbershop does have detainee barbers.

12 Q. So detainees are cutting hair? Are detainees
13 cutting hair?

14 A. Yes.

15 Q. What training do they receive?

16 A. The ICE standard in the Voluntary Work Program
17 assignment standard allows -- it says when you're
18 volunteering for a job, if you have prior experience in
19 a position, to note that on the job. A lot of the
20 barbers that we have have prior -- were doing barbers
21 before in prisons and jails or just have other -- have
22 cut hair before. Then we have a law library slash
23 barbershop officer that's -- that monitors that area.
24 He would tell them the specifics of where the tool
25 accountability and all the specifics of that area. And



1 as I said before, the Voluntary Work Program Agreement
2 for that particular job would have some of the training
3 guidelines listed on that Voluntary Work Program
4 Agreement.

5 Q. So right now I have listed sanitation and
6 cleaning, laundry, food services, and then
7 barbershop/law library, just so we have this running
8 list. I'd like to go through each one and ask who makes
9 sure that the task is done.

10 So the sanitation and cleaning, the detainee
11 worker starts, get trained, signs this Voluntary Work
12 Program Agreement. Then what happens in terms of how
13 the task is assigned?

14 MR. DONAHUE: Object to the form.

15 A. Well, I'm still confused. How the task is
16 assigned or who gets selected first for that position?

17 Q (By Ms. Chien) Let's do what you're
18 suggesting. Let's talk about how the detainee worker
19 gets selected.

20 A. So based on the ICE standard, the PBNDS
21 standard, there's a waiting list, essentially first-come
22 first-served in order of clearance to work in that
23 position. Then whoever is next on the waiting list is
24 next the detainee that would have that Voluntary Work
25 Program assignment.



1 day, seven days a week -- you know, five days a week.

2 Q. It took a lot of time?

3 A. It took a lot of time to hit all the
4 requirements.

5 Q. Was there anyone else who did the inspection
6 with you?

7 A. Not that would do the inspection with me.
8 There's other requirements in the standard where other
9 people have to do their own inspections. Food service,
10 health service, administrator, within that standard have
11 their own requirements. They would do the individual in
12 their areas. Then I would do the overall requirements
13 laid out in the standard for fire and safety.

14 Q (By Mr. Donahue) Can we take a break now?

15 MS. CHIEN: Let me just ask one last question.

16 Q (By Ms. Chien) Is there anyone from ICE that
17 participates in the weekly inspection?

18 A. Again, not under the requirements of the fire
19 and safety manager. The health service administrator
20 had required checks. But I don't run health --

21 Q. I'm just talking about the weekly fire and
22 safety inspection that we're talking about right now,
23 not any of these other inspections, just the weekly
24 safety and sanitation inspection.

25 MR. DONAHUE: Object to the form.



1 A. No.

2 MS. CHIEN: Thanks.

3 (Recess taken.)

4 MS. CHIEN: When we left, we were talking
5 about the weekly safety and sanitation inspection and
6 how you walk around the facility on a weekly basis. Is
7 there any written report that comes out of that?

8 A. Yes.

9 Q. Who does it go to?

10 A. There's a lot -- there's -- on the form
11 itself, there's a list of people. It pretty much goes
12 to all the department heads, the warden, the assistant
13 warden, the chief of security.

14 Q. What happens with the report? The report goes
15 to these department heads. Are there any actions taken
16 based on that report?

17 MR. DONAHUE: Object to the form.

18 A. Typically the form gets filed unless there's
19 an after action that is required. Then we have
20 discussion.

21 Q (By Ms. Chien) What happens if there's an
22 after action?

23 A. It really depends on what the after action is.
24 To go back to the door and the water leak issue, the
25 appropriate department will get notified of anything.



1 Or if there was a change in policy, to the policy
2 writers to make an update to policy.

3 Q. So let's say it's the door issue. Does that
4 mean you, as the fire and safety manager, ask
5 maintenance to fix the door after the report is
6 presented to the department heads? I'm just trying to
7 think of the mechanics of how it's happening.

8 MR. DONAHUE: Object to the form.

9 A. I can write a work order.

10 Q (By Ms. Chien) You could write a work order.
11 Did you need any approval from anybody?

12 MR. DONAHUE: Object to the form.

13 A. No.

14 Q (By Ms. Chien) Was there any other -- did
15 anything else happen with that report? It goes to the
16 department heads. Does it go to anybody else?

17 MR. DONAHUE: Object to the form.

18 A. No. No, it doesn't go specifically to anybody
19 else. No.

20 Q (By Ms. Chien) How often is it reviewed? Is
21 it reviewed once a week?

22 MR. DONAHUE: Object to the form.

23 Q (By Ms. Chien) When the report goes and then
24 the department heads see it, I'm assuming weekly. The
25 department heads are signing off on this report every



1 Q. Sorry. I'm not actually trying to talk about
2 how a specific detainee get assigned to the job. I'm
3 trying to identify: Does the gray mile happen on a
4 routine basis? Does the gray mile get cleaned on a
5 routine basis?

6 MR. DONAHUE: Object to the form.

7 A. It's a task that would be cleaned daily.

8 Q (By Ms. Chien) What about buffing, buffing
9 that gray mile?

10 MR. DONAHUE: Object to the form.

11 A. Buffing need not occur daily. The evening
12 cleaning crew -- it depends on how -- what task really
13 is needed that day. It depends on what they do. If
14 it's just sweep and mop or if it's buff, it depends.

15 Q (By Ms. Chien) Who decides when more than just
16 sweeping and mopping is necessary for the gray mile?

17 MR. DONAHUE: Object to the form.

18 A. It could be anybody. Detainees could be,
19 like, I want to touch over this area again. They could
20 say: I don't like the way that looks; can I go over
21 here and do this one again? Detainees could say it, or
22 it could be a lieutenant. It could be a captain or
23 major.

24 Q (By Ms. Chien) So the captain, major, and
25 lieutenant, and the detainee workers can decide when



1 buffing happens on the gray mile; is that right?

2 MR. DONAHUE: Object to the form.

3 A. I'm saying pretty much anybody that -- the
4 task is laid out. It's a Voluntary Work Program for
5 maintaining the cleanliness of the floor. Detainees, a
6 lot of them take great pride in how they do a floor and
7 how it looks. So they go out. If they say, I'd like to
8 do this again, we don't have any issue with them doing
9 that. Or no, maybe let's start working on from left to
10 right today instead of right to left. It really just
11 depends on the condition the floor of the day.

12 Q. How much are detainees paid for their work at
13 the Voluntary Work Program?

14 A. Detainees are paid a dollar a day.

15 Q. Have they ever been paid more than a dollar a
16 day?

17 MR. DONAHUE: Object to the form.

18 A. The only time I've ever heard of being paid
19 more than the dollar a day is the barbershop.

20 Q (By Ms. Chien) Can you explain?

21 A. From my understanding, the barbershop, based
22 on different classification levels, doesn't work as
23 often as other Voluntary Work Program jobs. So they
24 were allowed to have more than one job at a time. So
25 I -- take a step back. They could be allowed more than



1 which chemicals you used for the cleaning solutions?

2 A. I did not, no.

3 Q. Did people after you have to change the
4 chemicals for cleaning solutions?

5 MR. DONAHUE: Object to the form.

6 A. There was a time when Geo corporate wanted to
7 change companies for a, like, a nationwide service plan.
8 Those decisions are made well above my level.

9 Q (By Ms. Chien) Were they made by somebody who
10 works at the Northwest Detention Center?

11 A. No.

12 Q. What are the purposes of the job descriptions,
13 the Voluntary Work Program job descriptions?

14 A. What are the purposes of the voluntary program
15 job descriptions?

16 Q. Yes.

17 A. One is to let detainees know what they're
18 expected to perform on that work and to set out some of
19 the training and requirements that they need to know
20 before embarking on that job.

21 Q. So the job description is given to the
22 detainee worker.

23 A. The job description is signed for by each
24 detainee worker in the voluntary program, yes.

25 Q. Are you making a distinction there? So



1 determine if there need to be changes.

2 Q. Who would that be?

3 A. At the time my supervisor would have been Bill
4 McHatton.

5 Q. I'll give you a document to be marked as
6 Exhibit 161.

7 (Deposition Exhibit No. 161 marked for
8 identification.)

9 Q (By Ms. Chien) Do you recognize this document?

10 MR. DONAHUE: I just want to put on the record
11 161 has an attachment listed in the email header, but I
12 don't believe that attachment is attached to the email
13 string unless I'm missing something.

14 MS. CHIEN: No. Sorry.

15 A. (Reviewing document.) Okay. I've reviewed
16 it.

17 Q (By Ms. Chien) Do you recall this issue?

18 MR. DONAHUE: Object to the form.

19 Q (By Ms. Chien) Do you recognize this document?
20 What is it?

21 A. This is an email sent from me to Bill McHatton
22 and a few other Geo and IHSC employees.

23 Q. Do you recall what this issue was?

24 MR. DONAHUE: Object to the form.

25 A. I do.



1 Q (By Ms. Chien) Can you -- stepping away from
2 the document, what was the general issue?

3 A. Captain Broussard, who is the health services
4 administrator ensuring that we meet their standards for
5 cleanliness, brought a couple concerns as outlined in
6 the email to us.

7 Q. It refers to a "Daily Medical Cleaning
8 checklist." Do you see that?

9 A. Yes.

10 Q. Is that something that Geo maintains?

11 A. No.

12 Q. Is that an ICE document?

13 A. It's an IHSC document.

14 Q. Sorry. It's an IHSC document.

15 Then it refers to "Medical, please review for
16 accuracy IAW your policies." What does "IAW" mean?

17 A. In accordance with.

18 Q. It also says: "It now separates detainee
19 detail workers and Geo janitors more clearly."

20 MR. DONAHUE: Where are you reading from?

21 MS. CHIEN: That same paragraph.

22 MR. DONAHUE: Oh.

23 Q (By Ms. Chien) What's the difference between
24 detainee detail workers and Geo janitors?

25 A. The detainee workers cannot work in sensitive



1 areas of IHSC. So the janitors would clean those areas.

2 Where detainees, by standard or policy, are not allowed
3 to be, janitors do those areas.

4 Q. Are there any other differences?

5 A. No.

6 Q. How many Geo janitors are there?

7 A. Three.

8 Q. What are they responsible for?

9 A. Cleaning all areas of the facility where
10 detainees are not allowed to be.

11 Q. Do their tasks differ from the detainee
12 workers other than the physical area that they're
13 cleaning?

14 MR. DONAHUE: Object to the form.

15 A. Yes, their tasks are different.

16 Q (By Ms. Chien) How are they different?

17 A. Geo janitors have different equipment that the
18 detainees do not have access to for their areas.

19 Q. Can you give me some examples?

20 A. An example would be like a vacuum cleaner.

21 Q. That's a good example.

22 I want to go through this. If you go to
23 what's Bates stamped 626 . . .

24 A. (Witness complies.)

25 Q. It looks like it's an email from Michael Heye



1 MR. DONAHUE: Object to the form.

2 A. "Otherwise"? Can you be more specific?

3 Q (By Ms. Chien) Are you aware of detention
4 officers giving detainee workers food for work they
5 performed?

6 MR. DONAHUE: Object to the form.

7 A. I'm not aware of officers giving food for --
8 to detainees for the work that they performed.

9 Q (By Ms. Chien) Are you aware of detention
10 officers giving detainees food separate from their
11 meals, the normal three meals that they get?

12 MR. DONAHUE: Object to the form.

13 A. I mean the commissary gives detainee food.
14 But they buy it. I'm trying to understand.

15 Q (By Ms. Chien) I'm saying food for free, not
16 paid-for food, just food.

17 MR. DONAHUE: Object to the form.

18 A. We give additional food out at the holidays,
19 like a gift basket for the holidays.

20 Q (By Ms. Chien) Anything else?

21 A. Just can we go back and clarify? Are we
22 speaking of the Voluntary Work Program or outside the
23 Voluntary Work Program?

24 Q. Let's take it two at a time. Within the
25 Voluntary Work Program.



1 A. Inside the Voluntary Work Program, no.

2 Q. Now let's take it outside of the Voluntary
3 Work Program.

4 A. Outside of the Voluntary Work Program, food
5 service employees can eat whatever leftovers is left
6 after the meal in the food service. We have, in the
7 past, for the evening cleaning work crews, like on the
8 floor, outside the Voluntary Work Program, because of
9 the late night -- they are working between dinner and
10 breakfast, a long time -- we give them snacks at
11 nighttime.

12 Q. So that's outside of the Voluntary Work
13 Program?

14 A. Yes.

15 Q. When detainee workers are working at night,
16 it's outside of the Voluntary Work Program?

17 MR. DONAHUE: Object to the form.

18 A. That's not what I said.

19 Q (By Ms. Chien) So can you clarify for me.

20 A. If a detainee works at nighttime within the
21 Voluntary Work Program agreement -- right? -- but in the
22 past we had given them extra snacks because they are
23 working late night. It had nothing to do with the
24 Voluntary Work Program compensation at all. It's just a
25 good thing to do for a guy working late at night.



1 Q. Is that still the practice at the Northwest
2 Detention Center?

3 MR. DONAHUE: Object to the form.

4 A. No.

5 Q (By Ms. Chien) Why not?

6 A. We were advised by previous counsel to --

7 MR. DONAHUE: Hang on a second. I don't want
8 you to -- I'm going to instruct you not to answer. You
9 shouldn't discuss anything that you became aware of from
10 prior counsel.

11 THE WITNESS: Oh. Yes, I wasn't doing that,
12 then.

13 Q (By Ms. Chien) Who told you that we're not
14 going to -- I'm assuming it's not an attorney. So don't
15 answer if it was an attorney. But who told you that
16 Geo's not to pay -- is not to provide food for
17 late-night shifts?

18 MR. DONAHUE: Object to the form.

19 A. I don't know how to answer that question.

20 MR. DONAHUE: Let me consult with him on
21 privilege.

22 MS. CHIEN: Thank you.

23 (Recess taken.)

24 MR. DONAHUE: Thank you. I'm going to ask you
25 to read back the question.



1 A. Yes.

2 Q. How many post orders are there?

3 A. I don't know the exact number. If we have
4 a -- I don't know.

5 Q. More or less than 10?

6 A. More than 10.

7 Q. Is it for just, like, based on each detention
8 officer's job responsibilities or job title? What
9 merits something getting a post order?

10 A. A physical post on the staffing plan.

11 Q. Did you review all of the post orders as chief
12 of security?

13 A. Yes.

14 MS. CHIEN: I'm going to hand you a document
15 to be marked as Exhibit 169.

16 (Deposition Exhibit No. 169 marked for
17 identification.)

18 Q (By Ms. Chien) Do you recognize this document?

19 A. Yes.

20 Q. What is it?

21 A. This was an email to Mr. Kimble with an
22 attached post order, a housing unit post order.

23 Q. What does "shift chronological order" mean?

24 A. I think it refers to hourly activity, just the
25 hourly shift activity starting on page 4 of the post



1 order, which is Bates 49439.

2 Q. Do most port orders have shift chronological
3 orders?

4 A. Yes.

5 Q. Is it fair to say that this shift
6 chronological order that starts on page 4 is the
7 responsibility of the housing unit officer?

8 MR. DONAHUE: Object to the form.

9 A. It's what their tasks are supposed to be.
10 It's meant to assist officers day-to-day. It's not
11 meant to cover everything.

12 Q. You this is a glance at what they're supposed
13 to be doing?

14 A. A glance of activities that should occur
15 during the shift in a day.

16 Q. So if you go to page 5 of 30, which is Bates
17 stamped 49440 -- let's just look at 1200 hours, "lunch
18 meal," as a example. Do you see where I'm talking?

19 "All tables will be sanitized with the Oasis sanitizer
20 30 minutes prior to the meals being served."

21 A. Yes.

22 Q. Is that a task that the detention officer's
23 supposed to complete?

24 A. No.

25 Q. Who was supposed to complete that?



1 A. Typically the food porter, a part of the
2 Voluntary Work Program, cleans the tables prior to
3 serving food.

4 Q. So is a detention officer to make sure that --
5 this is listed in the detention officer's post order
6 because they are responsible for making sure the
7 detainee worker does it?

8 A. Yes.

9 Q. If you go to page 7 of 30, it says: "Get
10 supplies out and authorize detainee workers to clean the
11 unit." Are the supplies -- where are the supplies kept?

12 A. Where are you looking, ma'am?

13 Q. The last line of that page, 7 of 30.

14 A. Supplies and cleaning implements are in the
15 janitor's closet.

16 Q. Which is locked?

17 A. Yes.

18 Q. The detention officer has the key?

19 A. Yes.

20 Q. Detainee workers, do they have a key?

21 A. No.

22 Q. Can you go to page 19 of 30.

23 A. (Witness complies.)

24 Q. It says "Mop Head Pod Cleaning Schedule."

25 A. Yes.



1 detainees that need to be seen at the levels to ensure
2 that, throughout the week, his needed things happen.

3 MS. CHIEN: I'm going to ask for this to be
4 marked as Exhibit 172.

5 (Deposition Exhibit No. 172 marked for
6 identification.)

7 Q (By Ms. Chien) Do you recognize Exhibit 172?

8 A. Yes.

9 Q. What is it?

10 A. It a law library schedule for a Wednesday.

11 Q. Does the law library officer take the sign-up
12 sheet, Exhibit 171, and then build this schedule that's
13 172?

14 A. Yes.

15 Q. Is there any significance to the darker shaded
16 cells on Exhibit 172?

17 A. I don't know.

18 Q. When you were chief of security, did you have
19 to approve this law library schedule?

20 A. No.

21 Q. Did a sergeant or lieutenant?

22 A. No.

23 Q. Looking at the second page of this document,
24 what is a "Segregation Library Log"?

25 A. The segregation detainees cannot be in the



1 detainee workers refused to work?

2 MR. DONAHUE: Object to the form. Asked and
3 answered.

4 A. The only time I can recall is that one time
5 that I referred to earlier.

6 Q (By Ms. Chien) A couple of years ago, you
7 said?

8 A. Yes.

9 Q. So you were the chief of security for a year.
10 What's the next job that you had?

11 A. Assistant warden of security.

12 Q. So is that a promotion?

13 A. Yes.

14 Q. When did you become the assistant warden of
15 security? I'm sorry. Assistant or associate?

16 A. Assistant.

17 Q. Assistant?

18 A. Sometimes synonymous with associate. But it
19 was around August of last year.

20 Q. What happened in August of last year that led
21 you to being the assistant warden of security?

22 A. Well, the former assistant warden of security
23 retired.

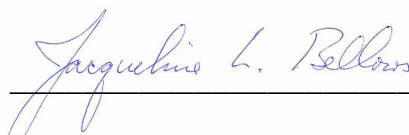
24 Q. Did you get any training when you become the
25 assistant warden of security?



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this 1st
day of June, 2019.



Jacqueline L. Bellows
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